



March 31, 2015

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, SW  
Office of the Secretary, Room TW B204  
Washington DC 20554

Re: GN Docket No. 13-114

Dear Ms. Dortch:

On March 31, 2015, staff from the Association of Flight Attendants-CWA, AFL-CIO (“AFA”), Transport Workers Union of America (“TWU”), and Dillard Group International (“DGI”) met with Brendan Carr, Legal Advisor to Commissioner Pai. The AFA representatives who attended the meeting were Chris Witkowski and Dinkar Mokadam, the TWU representative was Brendan Danaher, and the DGI representative was Denny Dillard.

At the meeting, the AFA, TWU and DGI representatives expressed concern with the proposal in GN Docket No. 13-114 to establish an air-ground mobile broadband service over the contiguous United States. These concerns are similar in nature to those expressed in reply comments, submitted by AFA, TWU and other organizations that form the Safety and Security in the Air Coalition (“SSAC”), to a Commission proposal that would lift a long-standing ban on using cell phones for voice and data on flights.<sup>1</sup> In the opinion of the AFA, TWU and DGI representatives, either proposal would greatly enhance communications capabilities for terrorists and increase cyberwarfare vulnerabilities, leading to unacceptable risks of successful attacks on the United States aviation system with significant and foreseeable adverse human and economic consequences.

The AFA, TWU and DGI representatives also summarized some information SSAC representatives had presented at a March 27, 2015 meeting of an interagency working group chaired by Adm. David Simpson, PSHSB Chief. At that meeting, the SSAC representatives proposed that the interagency working group bring together a broad range of government and industry subject matter experts to 1) develop a research study to characterize current threats and vulnerabilities; 2) categorize threats and vulnerabilities based on future progression of technologies; 3) identify potential solutions; and 4) recommend potential regulations and standards. This proposed study would assess the full scope of potential threats and vulnerabilities and attempt to develop and evaluate appropriate mitigations in order to provide thorough information before consideration of whether or not to proceed to finalize the rule proposed in GN Docket No. 13-114.

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<sup>1</sup> Expanding Access to Mobile Wireless Services Onboard Aircraft, 79 Fed. Reg. 2615 (Fed. Comm’n Comm’n Jan. 15, 2014).



Sincerely,

A handwritten signature in black ink, reading "Christopher J. Witkowski". The signature is written in a cursive style with a large, prominent initial "C".

Christopher J. Witkowski  
Director, Air Safety, Health and Security